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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Justin Baker

CASE NO. 22-cv-872-LK
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: ☒ Yes ☐ No

Plaintiff(s),

v.

Thrive Communities

Defendant(s).

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Justin Baker

Street Address 75 Vine St Unit 301

City and County Seattle, King County

State and Zip Code Washington 98121

Telephone Number 910-968-5210

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B. Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Thrive CommunitiesJob or Title *(if known)* _____Street Address 1518 1st Ave S #500City and County Seattle, King CountyState and Zip Code Washington 98134Telephone Number 206-388-2120

Defendant No. 2

Name _____

Job or Title *(if known)* _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

Defendant No. 3

Name _____

Job or Title *(if known)* _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

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Defendant No. 4

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

II. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)☒ Federal question☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

443 - Housing/Accommodations446 - Americans With Disabilities - Other(Both acts violated under section 504 and discrimination issues)

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B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual.

The plaintiff (*name*) _____, is a citizen of the
State of (*name*) _____.

b. If the plaintiff is a corporation.

The plaintiff, (*name*) _____, is incorporated under
the laws of the State of (*name*) _____, and has its principal
place of business in the State of (*name*) _____.

*(If more than one plaintiff is named in the complaint, attach an additional page providing
the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual.

The defendant, (*name*) _____, is a citizen of the
State of (*name*) _____. Or is a citizen of
(*foreign nation*) _____.

b. If the defendant is a corporation.

The defendant, (*name*) _____, is incorporated under
the laws of the State of (*name*) _____, and has its principal
place of business in the State of (*name*) _____.

Or is incorporated under the laws of (*foreign nation*) _____,
and has its principal place of business in (*name*) _____.

*(If more than one defendant is named in the complaint, attach an additional page
providing the same information for each additional defendant.)*

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3. The Amount in Controversy.

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (*explain*):

\$150,000.00 for current and subsequent violations of ADA act and FHA acts, for failure to provide reasonable accommodations in a timely fashion. Also, \$100,000.00 for disability discrimination.

All violations are included under Section 504, as accommodations and modifications are the same.

III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Thrive Communities treated me unfairly and disregarded my safety. They disregarded the enjoyment of my home for 5 months, and discrimination was apparent by the regional manager not taking my claims seriously about FHA violations until 5 months after lease commencement and several requests.

IV. RELIEF

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

\$250,000.00 for 30 email, 10 verbal, and 4 phone reasonable

accommodation requests, all refused by Thrive and unsatisfied

within 10 days allowable by federal law, enforceable by FHA and ADA, as well as disability discrimination for not taking my request seriously.^{All}

under Section 504 as well.

CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper

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purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
(2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or
reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so
identified, will likely have evidentiary support after a reasonable opportunity for further
investigation or discovery; and (4) the complaint otherwise complies with the requirements of
Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related
papers may be served. I understand that my failure to keep a current address on file with the
Clerk's Office may result in the dismissal of my case.

Date of signing: 6/9/2022

Signature of Plaintiff 

Printed Name of Plaintiff Justin Baker

Date of signing: _____

Signature of Plaintiff _____

Printed Name of Plaintiff _____

Date of signing: _____

Signature of Plaintiff _____

Printed Name of Plaintiff _____